

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ONASSIS NGUYEN

Plaintiff

v.

CHARTIS CLAIMS, INC. f/k/a AIG
CLAIMS SERVICES, INC., and NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA

Defendant

CIVIL ACTION NO.

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§1332, 1441, 1446 and LR, D. Mass 81.1, the defendants Chartis Claims, Inc. and National Union Fire Insurance Company of Pittsburgh, Pa. (collectively the “defendants”), submit this Notice of Removal, and as grounds state as follows:

1. On or about September 22, 2011, the above action was filed in Worcester Superior Court, Worcester County. The caption of the Complaint is as follows: *Onassis Nguyen v. Chartis Claims, Inc. f/k/a AIG Claims Services, Inc. and National Union Fire Insurance Company of Pittsburgh, PA*, Worcester Superior Court, Civil Action No. 11-1867B.
2. Chartis Claims, Inc. was served with the Summons and Complaint on or about October 3, 2011.
3. Removal is timely under 28 U.S.C. § 1446(b), as fewer than 30 days have passed since the defendants were purportedly served with process.

4. A copy of the Complaint and all other process, pleadings and orders served upon the defendants in this action is attached hereto as Exhibit A.

5. Removal is based on diversity of citizenship between all parties and the amount in controversy which exceeds \$75,000.

6. According to the Complaint, the plaintiff, Onassis Nguyen, is a natural person with a residence located in Leominster, County of Worcester, Massachusetts.

7. The defendant, Chartis Claims, Inc. is a corporation organized under the laws of the state of Delaware with its principal place of business in New York, New York.

8. The defendant, National Union Fire Insurance Company of Pittsburgh, Pa., is a corporation organized under the laws of Commonwealth of Pennsylvania with its principal place of business in New York, New York.

9. The plaintiff alleges damages which currently exceed \$2,107,000.00.

10. In accordance with 28 U.S.C. 1446(d), written notice of the filing of this Removal Notice will be given to all parties to this suit and will be filed with the clerk of the Worcester Superior Court, following the filing of this notice.

11. In submitting this Notice of Removal, the defendants reserve all defenses to this action.

Accordingly, the defendants hereby file and submit their Notice of Removal.

CHARTIS CLAIMS, INC f/k/a AIG
CLAIMS SERVICES, INC., and
NATIONAL UNIOT FIRE INSURANCE
COMPANY OF PITTSBURGH, PA

By their attorneys,

/s/ Allen N. David

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DATED: October 18, 2011

CERTIFICATE OF SERVICE

I, Allen N. David, do hereby certify, that I have, this 18th day of October, 2011, served the foregoing above document, by causing a copy thereof, to be sent electronically to the registered participants in this case, if any, as identified on the Notice of Electronic Filing (NEF) and to be served by first class mail to counsel of record:

Richard J. Sullivan, Esq.
Eugene F. Sullivan, Jr., Esq.
Sullivan & Sullivan, LLP
40 Washington Street
Wellesley, MA 02481

/s/ Allen N. David

Allen N. David